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Attorney for Applicant,
JAY PARK

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

<i>In re Ex Parte</i> Application of) CASE NO. 5:25-mc-80005
)
JAY PARK,) DECLARATION OF JISU LEE IN
) SUPPORT OF APPLICANT'S EX PARTE
) APPLICATION FOR AN ORDER
Applicant.) PURSUANT TO 28 U.S.C. § 1782
) AUTHORIZING DISCOVERY FOR USE
) IN A FOREIGN CIVIL PROCEEDING
)
)

I, Jisu Lee, declare that:

1. I am over the age of 18 years old, I am competent to testify on the matters stated in this declaration, and I have personal knowledge of the matters stated herein, unless expressly stated otherwise.

2. This declaration is in support of the Applicant's Ex Parte Application for an Order Pursuant to 28 U.S.C. § 1782 Authorizing Discovery for Use in a Foreign Civil Proceeding ("Application").

3. I am the Head of Brand Communication at MORE VISION. ("**MORE VISION**"), a South Korean record label established in 2022 under the laws of the Republic of Korea ("**Korea**"). MORE VISION's principal place of business is in Korea. One of my responsibilities at MORE VISION is to deal with social media issues, including but not limited to false, defamatory or

1 harassing statements made about the company and its artists.

2 4. MORE VISION is a private company engaged in the entertainment business with
3 founded by Jay Park (“**Applicant**”), a renowned musician and entrepreneur based in South Korea.

4 5. Between October 17, 2024 and October 31, 2024, an unidentified person using the
5 YouTube handle “@뿌링사무소” (“Bburingsamuso”) published two YouTube short-form videos
6 (“Shorts”) and two community posts about the Applicant on his or her YouTube channel titled
7 “Bburingsamuso” (Korean original: “뿌링사무소”). The unidentified person continued to attack
8 Applicant in the comment section of those posts.

9 6. The Shorts, community content, and comments contain false, defamatory and/or
10 harassing statements about the Applicant. These include but are not limited to the following:

11 a. Short titled “제시 측근 코알라 ‘나는 한국인?’” (“Jessi’s associate Koala ‘I
12 am Korean?’”)¹ (English translation). This video also makes claims such as
13 “Koala and their group are part of the Triads and supply drug to the hip-hop
14 scene.” The video shows Koala in Jay Park’s company, More Vision, and also
15 shows Koala depicted next to Jay Park with the YouTuber emphasizing their
16 close relationship. Attached as **Exhibit 1** is a true and correct screenshot of the
17 YouTube Short with English translations.

18 b. In comments posted on the short², the YouTuber states “Is Jay Park some kind
19 of untouchable figure? Are we not allowed to speak about visible facts? At the
20 Rolling Loud 2023 Thailand OKX Stage, Jay Park and Jessi were the main
21 Korean artists, and OKX is a cryptocurrency exchange. Don’t you get it? Then
22 stop telling me what to do,” implying that the Applicant is part of alt-
23 cryptocurrency and unethical financial dealings. The YouTuber comments in
24 response to the comment on his or her Short “let’s clean up these kinds of
25 foreigners” with “burn them” (English translation). Attached as **Exhibit 2** is a
26 true and correct screenshot of the comments with English translations.

27
28 ¹ <https://www.youtube.com/shorts/eInpSGEKvoA>

² <https://www.youtube.com/shorts/eInpSGEKvoA>

- c. In a community content posted by the YouTuber, he or she states “A highly significant video will be uploaded soon to provide insight into the double lives of Korean American celebrities. Prepare to be furious. When Korean American entertainers (referring to Jay Park along with his picture) who exploit Korea accumulate wealth, their Korean Town cronies often follow as drug couriers. To these Korean Americans, Korea isn’t a place to settle, it is merely a playground where they make money, cause chaos, enjoy themselves, and leave when it suits them . . . P.S. I really want to smash all of your heads” (English translation). This post was posted alongside Jay Park’s photo. This post has since been deleted, but attached as **Exhibit 3** is a true and correct screenshot of the post with English translations.
- d. Short titled “이진호 도박 자수엔 제시가 껴있” (“Lee Jin-Ho’s gambling confession involves Jessi”) (English translation). Although this video does not directly use Jay Park’s image or explicitly mention his name, it makes claims such as, “Koala and their group are part of the Triads and supply drugs to the hip-hop scene” (referring to Jay Park as well). Toward the end of the video, the speaker says, “especially you, soju seller, you’re the worst,” implying and indirectly referencing a specific individual, Jay Park. This video has since been deleted, but attached as **Exhibit 4** is a true and correct screenshot of the Short with English translations.
- e. In a community content posted by the YouTuber, he or she states “as times have progressed, so too have the business ventures of the Triad. Do you remember the major investment fraud that occurred after claims of recreating the likeness of famous celebrities using deep-fake and AI? That was all the work of this Triad. OKX is a Chinese cryptocurrency (futures) exchange. It’s a massive exchange, ranking number two in transaction volume worldwide.” (English translation). The YouTuber further adds “Even while producing outstanding hit songs, Jay Park has occasionally released Chinese language tracks. Last year,

1 he made a remarkable appearance on the Chinese TV show RAP OF CHINA
 2 and had the establishment of the stylish new MORE VISION headquarters in
 3 Nonhyeon-dong” (English translation). This community post was posted to
 4 Bburingsamuso’s public YouTube channel alongside with Jay Park’s photo.
 5 This post has since been deleted, but attached as **Exhibit 5** is a true and correct
 6 screenshot of the post with English translations.

7 f. In a community content posted by the YouTuber, he or she states “I will not let
 8 the suspicions surrounding Jessi’s assault case be quietly buried with a second
 9 apology letter or by using Jessi as a scapegoat. I will continue to uncover the
 10 suspicions behind this case and bring up chronic issues. . . Our country belongs
 11 to Koreans, not to Korean Americans. We must protect our country. P.S. Jessi,
 12 Jay Park, Koala, those pig bastards – unfollowed them all” (English translation).
 13 This post has since been deleted, but attached as **Exhibit 6** is a true and correct
 14 screenshot of the post with English translations.

15 7. These posts and shorts have millions of views and thousands of comments.
 16 The YouTuber’s posts have inflicted and continued to inflict significant reputational damage on
 17 the Applicant. The Youtuber’s false allegations, defamatory and/or harassing statements
 18 against the Applicant caused damages to Applicant and his company which is also featured on
 19 the YouTuber’s channel.

20 8. To date, the Applicant’s efforts to locate this anonymous person or entity by
 21 searching publicly available information have failed to find the true identity of the YouTuber.

22 9. Based on the words and expressions in these posts that were originally published in
 23 Korean, we believe that the YouTuber is a native Korean speaker and is likely to be based in Korea.
 24 To date, we have not discovered anything that would indicate the YouTuber is a non-Korean
 25 citizen or that he or she resides in the US.

26 10. On December 10, 2024, the Applicant filed a civil lawsuit against the anonymous
 27 YouTuber in Seoul, Korea (“Korean Civil Matter”) for publishing defamatory YouTube videos.
 28 The Applicant is claiming defamation pursuant to Articles 750 and 751 of the Civil Act of Korea

1 against the YouTuber.

2 11. Unless the identity of the anonymous YouTuber is revealed, the Applicant will not
3 be able to proceed with the Korean Civil Matter. As a result, the Applicant intends to use the
4 identity of the anonymous YouTuber for the Korean Civil Matter.

5 12. The anonymous YouTuber's false, defamatory and/or harassing statements have
6 caused irreparable harm to the Applicant. The YouTuber may continue to upload false, defamatory
7 and/or harassing statements about the Applicant and there is nothing stopping them from doing so
8 unless the Applicant can proceed with the Korean Civil Matter. We look forward to identifying
9 the person responsible for these statements so that the Applicant's rights can be recognized by the
10 Korean civil court.

11 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
12 United States of America that the foregoing is true and correct.

13 Executed on January 7, 2025

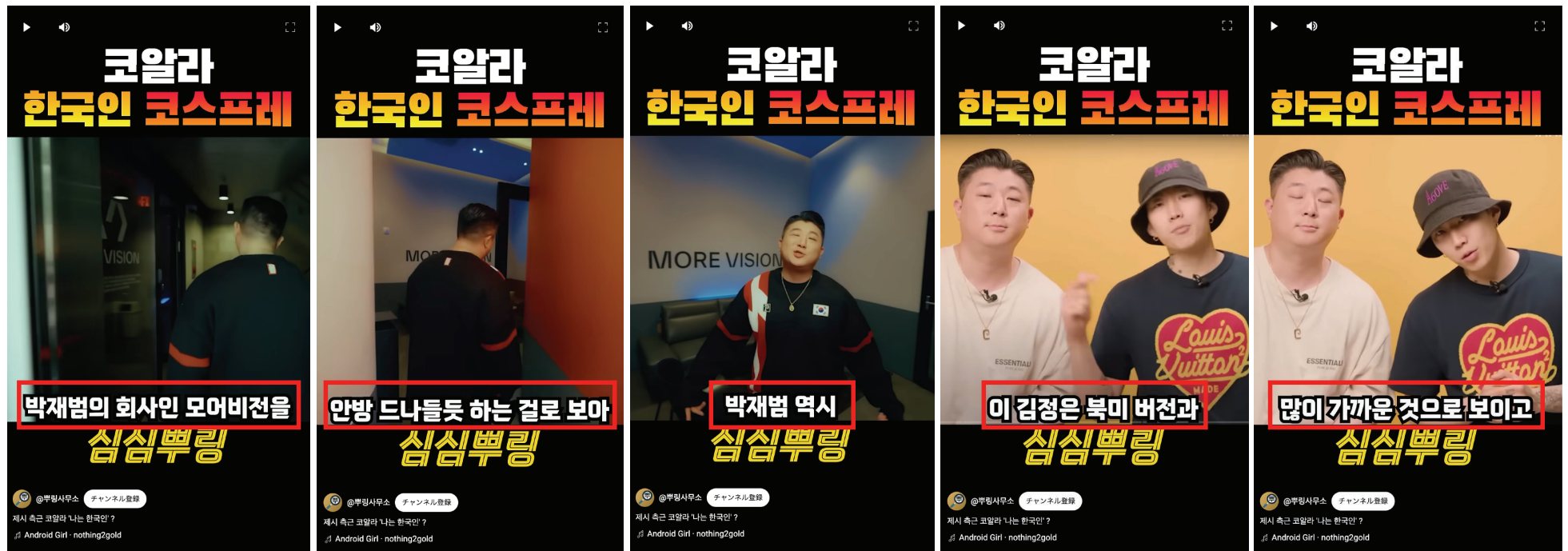
14
15
16 Jisu Lee



EXHIBIT 1

<https://www.youtube.com/shorts/elnpSGEKvoA>

This video also makes claims such as, "Koala and their group are part of the Triads and supply drugs to the hip-hop scene."



Judging by how frequently he visits Jay Park's company, MORE VISION,

as if it were his own private space,

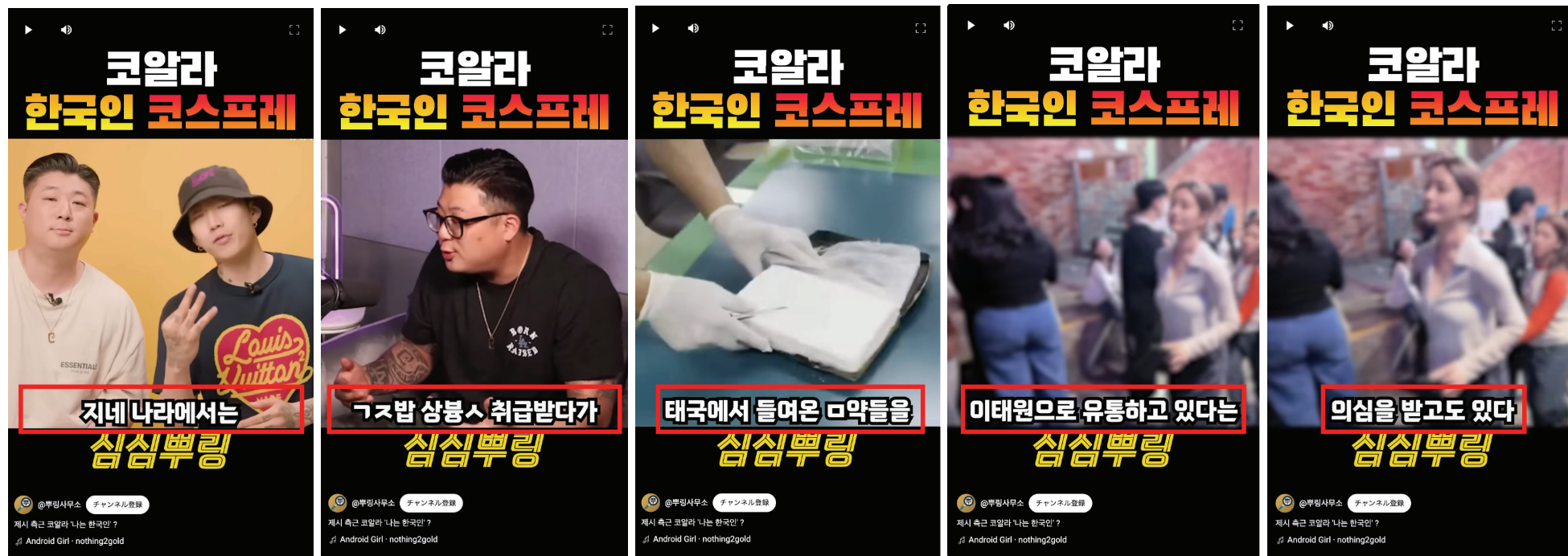
it appears that Jay Park may also

have a close relationship with

this "North American version of Kim Jong-un."

<https://www.youtube.com/shorts/elnpSGEKvoA>

This video also makes claims such as, "Koala and their group are part of the Triads and supply drugs to the hip-hop scene."



He was treated like a loser

in the United States.

He is now suspected of

distributing drugs

imported from Thailand to Itaewon.

EXHIBIT 2

<https://www.youtube.com/shorts/elnpSGEKvoA>

They are spreading rumors that Jay Park is involved with questionable Chinese cryptocurrency, mentioning the OKX stage at the Rolling Loud 2023 Thailand performance held in April 2023.

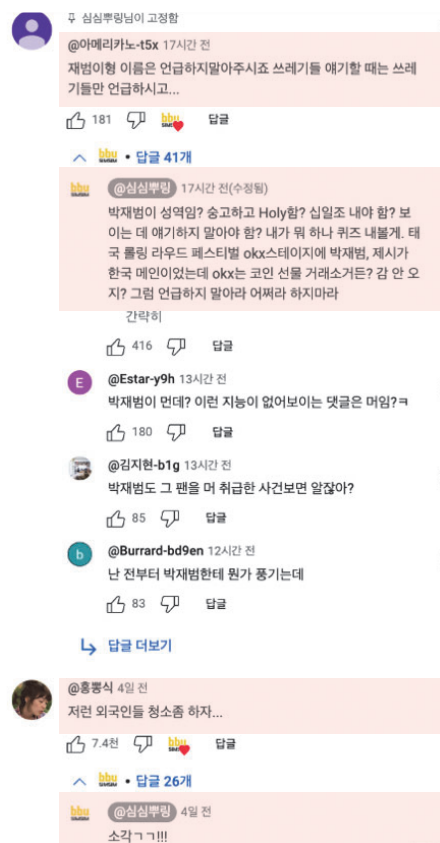
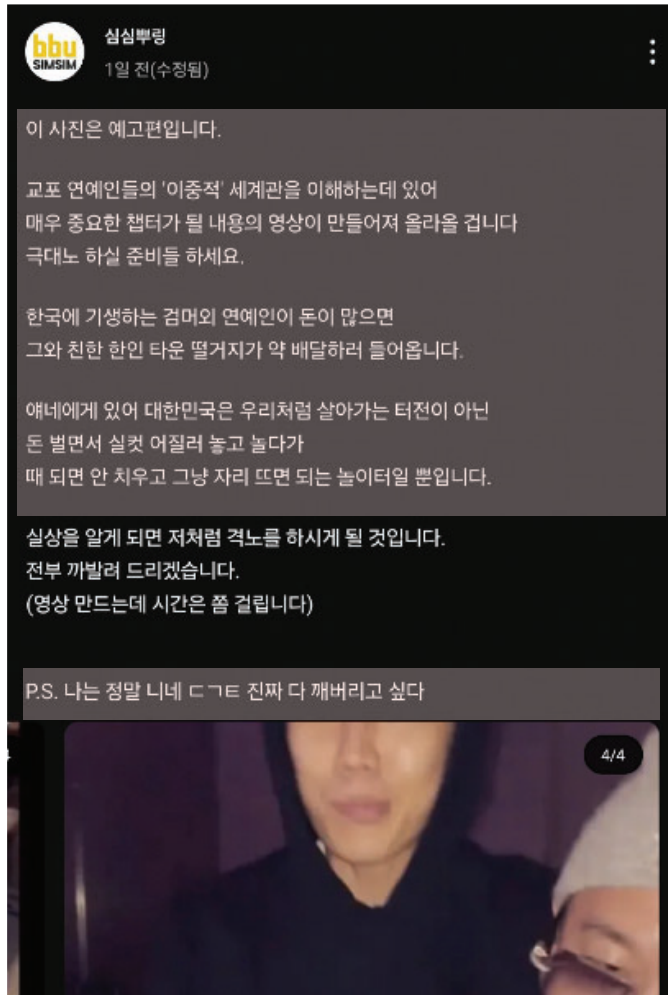


EXHIBIT 3



This photo is a preview.

A highly significant video will be uploaded soon to provide insight into the double lives of Korean-American celebrities. Prepare to be furious.

→

When Korean-American entertainers (=Jay Park) who exploit Korea accumulate wealth, their Korean Town cronies often follow as drug couriers.

To these Korean-American, Korea isn't a place to settle—it's merely a playground where they make money, cause chaos, enjoy themselves, and leave when it suits them.

→

P.S. I really want to smash all of your heads. (=Jay Park and those Korean American entertainers)

(Jay Park's photo is used)

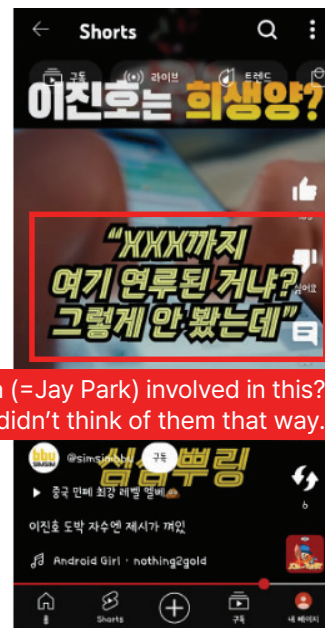
EXHIBIT 4

<https://www.youtube.com/shorts/MjUVCCBIEhE>

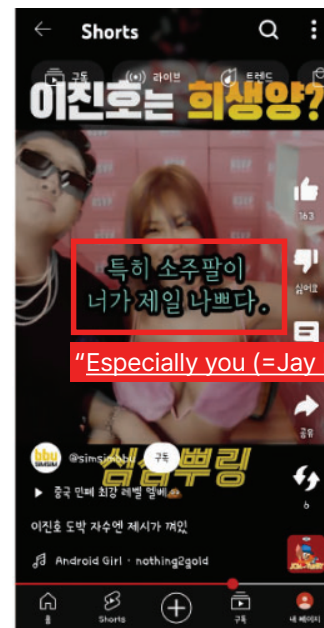
*The video is currently set to private, so we've attached a screenshot.

Although the video does not directly use Jay Park's image or explicitly mention his name, it makes claims such as, "Koala and their group are part of the Triads and supply drugs to the hip-hop scene."

Toward the end of the video, the speaker says, "Especially you, soju seller, you're the worst." implying and indirectly referencing a specific individual (=Jay Park).

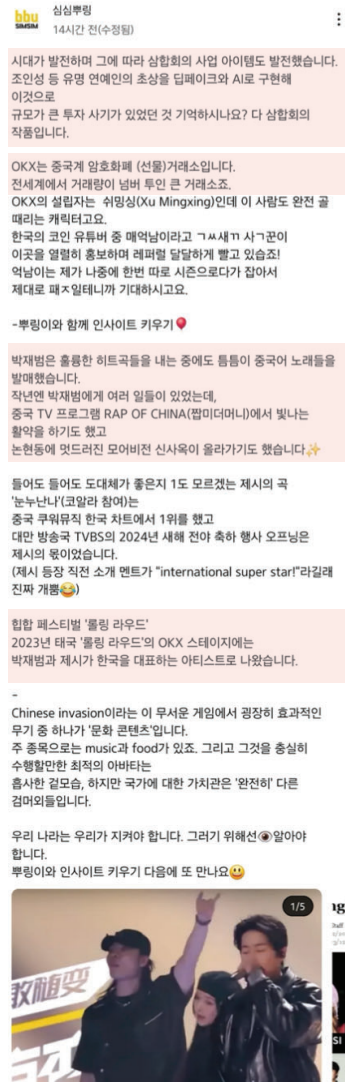


Is even that person (=Jay Park) involved in this?
I didn't think of them that way.



"Especially you (=Jay Park), soju seller, you're the worst"

EXHIBIT 5



As times have progressed, so too have the business ventures of the Triad.

→ Do you remember the major investment fraud that occurred after claims of recreating the likeness of famous celebrities using deepfake and AI? That was all the work of this Triad.

→ OKX is a Chinese cryptocurrency (futures) exchange. It's a massive exchange, ranking number two in transaction volume worldwide.

→ Even while producing outstanding hit songs, Jay Park has occasionally released Chinese-language tracks. Last year, he made a remarkable appearance on the Chinese TV show RAP OF CHINA and had the establishment of the stylish new MORE VISION headquarters in Nonhyeon-dong.

→ At the OKX Stage of the hip-hop festival Rolling Loud 2023 Thailand, Jay Park and Jessi represented South Korea as featured artists.

(Jay Park's photo is used)

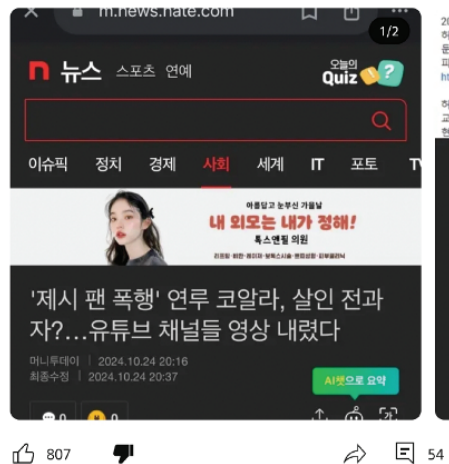
EXHIBIT 6

bbu 심심뿌링
SIMSIM 2시간 전(수정됨)

'제시 압구정 폭행 사건'에 대한 의혹을
2차 사과문과 제시의 총알받이 정도로
얼레벌레 조용히 묻히지 못하도록 할 겁니다.
이 사건의 의혹들을 하나둘 풀어나가며 더 큰, 고질적인 문제들을
계속 끄집어 낼 겁니다.
뉴스들이 함께 집중을 유지해 줌과 동시에 더 많은 대중들이
알아야 할 것들을 알 수 있도록 오늘도 뿌링뿌링👉가봅니다
우리나라는 검머외들이 아닌 우리 한국인들의 것입니다
우리나라는 우리가 지켜야 합니다🇰🇷

P.s.

제시 박재범 허재원돼지스기
다 언팔함👉



댓글 54

댓글 몇몇 분들 글보고 박재범에 대해 오해하시는 듯 한데 강 언팔했다는 거 아닌가요???

- I will not let the suspicions surrounding Jessi's assault case be quietly buried with a second apology letter or by using Jessi as a scapegoat.
I will continue to uncover the suspicions behind this case and bring up chronic issues.
- Our country belongs to Koreans, not to Korean-Americans. We must protect our country.
- P.S. Jessi, Jay Park, Koala, those pig bastards – unfollowed them all.